any ownership interest of Grace Plummer or Elizabeth Plummer in Lot 18, New Market.

- 16. That the Complainant's decedent and her predecessors in title have been paying the property taxes and occupying the subject property for more than 20 years.
- 17. That the Complainant's decedent and her predecessors in title have maintained actual and visable, continuous, exclusive, hostile, notorious and adverse possession and control of the subject property, Lots 19 and 20, for a period of over 20 years.
- 18. That your Complainants aver that the aforementioned deed from the said Grace Plummer, et al, unto Joseph Wood, et ux, dated June 25, 1847, and the aforementioned deed from Nicholas Shipley unto Grace Plummer, et al, dated March 8, 1844 and recorded in Liber HS 23, folio 35, one of the Land Records of Frederick County, Maryland, each intended to convey Lots 19 and Lots 20 rather than Lots 18 and Lot 19, and that it is clear from reference from the aforesaid exhibits that four contiguous lots, situate north of the New Market Pike and west of Federal Street that is Lots 19, 20, 86 and 87 were at all times intended to be conveyed as a blockunit.
- 19. That no action at law is now pending to enforce or test the validity of the title to the property.

WHEREFORE, your Complainant prays

- 1. That this Honorable Court take jurisdiction of the subject property and enter a Decree quieting title and/or granting adverse possession to the Complainant of the subject property described in the Bill of Complaint.
- 2. That this Honorable Court decree that the Complainant has good and marketable fee simple title to the subject property described herein and that she may sell, convey or otherwise deal with this property with regard to the claims of any one.
- 3. That this Honorable Court shall reform the deed recorded in Liber 556, folio 274, one of the Land Records of Frederick County, Maryland, to reflect the

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